

# COFFEY | BURLINGTON

ATTORNEYS AT LAW

April 23, 2020

*Via CM/ECF*

The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**KENDALL COFFEY**  
kcoffey@coffeyburlington.com

2601 South Bayshore Drive, Penthouse  
Miami, Florida 33133  
T.305-858-2900 F.305-858-5261  
www.coffeyburlington.com

RE: *United States v. Kozel*, Case No. 19-cr-460-KMW

Dear Judge Wood:

I write respectfully to request an extension of the briefing dates on the pending Motion to Dismiss and Motion for Bill of Particulars. The parties are now in good-faith negotiations with respect to a global resolution of the issues between them, which require additional time and investigation for Defendant to analyze. These discussions have been delayed by the coronavirus crisis affecting the entire country, particularly that Defendant has been stricken by the illness, although he is recovering from it.

The parties are in agreement that to facilitate their discussions, the briefing schedule with respect to the pending motions should be postponed. With agreement of the Government, we request that the Government's response to both motions be served by June 4, 2020, and Defendants' reply by June 25, 2020.

The parties are also in agreement that the time until June 25, 2020 shall be excludable time under the Speedy Trial Act.

Respectfully submitted,

*/s/Kendall B. Coffey*

Kendall B. Coffey  
*Counsel for Todd Kozel*

cc: Louis Pellegrino, AUSA  
Olga Zverovich, AUSA